

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COLBY GOROG, JOSHUA FLINT,
LOUIS ROBINSON, and MICHAEL LERRO,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

ELON MUSK and TESLA, INC.,

Defendants.

Civil Action No.: 1:22-cv-05037-AKH

**PLAINTIFFS' NOTICE OF CROSS-
MOTION FOR SANCTIONS,
DISQUALIFICATION AND TO SEAL
DOCUMENT**

**PLAINTIFFS' NOTICE OF CROSS-MOTION FOR SANCTIONS PURSUANT
TO FRCP Rule 11 and Title 28 U.S.C. § 1927, DISQUALIFICATION OF
DEFENSE COUNSEL AND TO SEAL DOCUMENT**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and the Declaration of Evan Spencer in Support of Plaintiffs' cross-motion, the Order of this Court, ECF No. 105, the opposition, declarations, and expert report filed today by Plaintiffs in response to Defendants' motion to amend, Plaintiffs' opposition to Defendants' motions to dismiss the Third Amended Complaint, ECF No. 96, Plaintiffs' opposition to Defendants' motion to dismiss the Fourth Amended Complaint ECF No. 111, and any other arguments or materials that the Court may consider before this motion is taken under submission, Plaintiffs hereby move this Court, before the Honorable Alvin K. Hellerstein, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be set by the Court, pursuant to Federal Rules of Civil Procedure, to grant Plaintiffs monetary sanctions, disqualify Quinn Emmanuel, and seal Plaintiffs' confidential settlement offer. ECF No. 118, Ex. 1.

DATED: October 11, 2024

By: /s/ Evan Spencer
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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 10th day of October 2024, a true and correct copy of the above and foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system, giving notice to all parties in this action.

/s/Evan Spencer
Evan Spencer